

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

D.V.D., *et al.*,

Individually and on behalf of all others  
similarly situated,

Plaintiffs,

V.

U.S. Department of Homeland Security, *et al.*,)

Defendants.

No. 1:25-cv-10676-BEM

**DEFENDANTS' RESPONSE TO COURT'S MAY 21, 2025 ORDERS**  
**(ECF Nos. 120, 121)**

On May 21, 2025, the Court ordered Defendants to submit several declarations and identify the aliens on the plane that was subject to the Court's inquiries during the May 20 and May 21, 2025 hearings. ECF No. 120-121. Pursuant to the Court's orders, Defendants submit the two attached declarations responding to ECF No. 121 and the Court's request that Defendants identify the aliens on the plane. Ex. A-B. Defendants are working diligently to respond to the Court's order regarding N.M. ECF No. 120.

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

DREW C. ENSIGN  
Deputy Assistant Attorney General

ELIANIS N. PEREZ  
Assistant Director

MATTHEW P. SEAMON  
Senior Litigation Counsel

/s/Mary L. Larakers  
MARY L. LARAKERS  
Senior Litigation Counsel  
U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
(202) 353-4419  
(202) 305-7000 (facsimile)  
mary.l.larakers@usdoj.gov

**CERTIFICATE OF SERVICE**

I, Mary Larakers, Senior Litigation Counsel, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: May 22, 2025

/s/ Mary L. Larakers  
Mary L. Larakers  
Senior Litigation Counsel